

# Atlantic Richfield Company

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RECEIVED

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SUPERFUND DIV.  
DIRECTOR'S OFFICE

November 5, 2010

Mr. Kevin Shade  
USEPA REGION 6  
1445 Ross Avenue, Suite 1200  
**Mail Code:** 6SF  
Dallas, TX 75202-2733

Mr. Stephen Calpuyan  
USEPA REGION 6  
1445 Ross Avenue, Suite 1200  
**Mail Code:** 6SF  
Dallas, TX 75202

**Re: Jackpile-Paguete Mine Site  
Initial Response to EPA 104(e) Request and Request for Extension of Time**

Dear Mssrs Shade and Calpuyan:

This letter confirms our telephone conversation this week during which I conveyed Atlantic Richfield's and request for a further extension of time in which to respond to EPA's Section 104(e) Request for Information.

As we discussed, Atlantic Richfield has completed an internal search of the Company archives to identify documents and maps responsive to EPA's Request. As previously agreed by EPA, Atlantic Richfield was granted an extension through November 8, 2010 to further respond to EPA's Request. While we have made substantial progress in identifying records, our detailed review of the records found is not complete. Thus, we are unable to submit a complete response to EPA by November 8<sup>th</sup>.

In the first phase of our review, more than 200 boxes were retrieved from the Company archives that contained at least some material related to the Mine and the topics identified in EPA's Request. Our detailed review of those records continues. Responsive records will be produced to EPA with Atlantic Richfield's written response to EPA's Request. Given the volume of records involved, we estimate the review and scanning process will continue into January 2011. Thus, Atlantic Richfield requests a further extension of time through February 18, 2011 to submit a complete response to EPA's Request.

As we also discussed, more than 1,000 map files (each potentially containing multiple maps) have been found in the archives. These maps are in addition to maps that are part of a report or other record which is responsive to EPA's Request and will be scanned for electronic transfer to EPA. The maps are generally oversized and costly to copy. Many of the maps we believe were previously copied and transferred to the Pueblo of Laguna under



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the December 1986 "Agreement to Terminate Leases" that I provided to EPA as an enclosure to my September 13, 2010 letter to you. Given the volume involved and our uncertainty as to what EPA has interest in receiving, AR has proposed to make the map files available for EPA's inspection at a Company office location in either Los Angeles or Dallas, if there is interest in reviewing the map files. At EPA's request, copies of specific maps would be prepared by Atlantic Richfield and provided to EPA.

Thank you for EPA's consideration of Atlantic Richfield's request for a further extension. I am available to further discuss logistics for review of the Atlantic Richfield map files at your convenience.

Respectfully,



Cynthia D. Kezos  
Strategy Manager

cc:	Robert Trull	BP Remediation Management
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	Sheila D'Cruz	BP Legal
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